

SULLIVAN & CROMWELL

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January 7, 2000

MEMORANDUM TO: Secretary of the Senate  
Office of Public Records

FROM: Thomas D. Mullins  
Government Affairs Specialist

RE: 1999 Midyear Lobbying Report on behalf of  
Securities Industry Association

In response to your letter of December 10, 1999, a copy of which is enclosed for your reference, this memorandum is to affirm that we did in fact submit to your office on August 13, 1999, and to the House on the same day, a 1999 Midyear Lobbying Report (the "Report") on behalf of our client, the Securities Industry Association.

Enclosed herewith for your reference is a photocopy of this Report. We are also sending a courtesy copy of this memorandum and a copy of the Report to the Clerk of the House of Representatives, in the event they also did not receive our August submission.

Please feel free to contact me at (202) 956-7542 if you have any questions regarding this matter.

T.D.M.

(Enclosures)  
cc: Clerk of the House of Representatives

Clerk of the House of Representatives  
Legislative Resource Center  
B-106 Cannon Building  
Washington, DC 20515

Secretary of the Senate  
Office of Public Records  
232 Hart Building  
Washington, DC 20510

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## LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page

1. Registrant Name <b>Sullivan &amp; Cromwell</b>			
2. Address <input type="checkbox"/> Check if different than previously reported <b>1701 Pennsylvania Avenue, NW, Washington, DC 20006</b>			
3. Principal Place of Business (If different from line 2) City: _____ State/Zip (or Country): _____			
4. Contact Name <b>Robert H. Craft, Jr.</b>	Telephone <b>(202) 956-7500</b>	E-mail (optional)	5. Senate ID # <b>37232-90</b>
7. Client Name <input type="checkbox"/> Self <b>Securities Industry Association</b>	6. House ID # <b>30572001</b>		

TYPE OF REPORT 8. Year 1999 Midyear (January 1-June 30) ☒ OR Year End (July 1-December 31) ☐

9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☐ ⇒ Termination Date \_\_\_\_\_ 11. No Lobbying Activity ☐

### INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<b>12. Lobbying Firms</b>  INCOME relating to lobbying activities for this reporting period was:  Less than \$10,000 <input type="checkbox"/>  \$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>120,000</u> Income (nearest \$20,000)  Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	<b>13. Organizations</b>  EXPENSES relating to lobbying activities for this reporting period were:  Less than \$10,000 <input type="checkbox"/>  \$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$20,000)  <b>14. REPORTING METHOD.</b> Check box to indicate expense accounting method. See instructions for description of options.  <input type="checkbox"/> Method A. Reporting amounts using LDA definitions only  <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code  <input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code
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Signature \_\_\_\_\_

Printed Name and Title \_\_\_\_\_

LD-2 (REV. 6/98)

PAGE 1 of 2

Registrant Name Sullivan & Cromwell Client Name Securities Industry Association

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code TAX (one per page)

16. Specific lobbying issues

Federal tax legislation and regulations affecting financial products;  
including H.R. 2488.

17. House(s) of Congress and Federal agencies contacted

☐ Check if None

Senate  
House of Representatives  
Joint Committee on Taxation  
Department of the Treasury

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New
David P. Hariton		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

Signature Thomas Mullins Date August 13, 1999

Printed Name and Title Thomas D. Mullins, Government Affairs Specialist

Form LD-2 (Rev. 6/98)

Page 2 of 2